

My name is Andrew Ó Baoill, and I am station manager of WRFU-LP, a radio station in Urbana, IL, that is one of the beneficiaries and progeny of the LPFM licensing regime. I am in addition a PhD student at the Institute of Communications Research at the University of Illinois, where my research focuses on the role of community radio. I write today to express my support for the actions the Commission has undertaken to facilitate the growth and development of the LPFM sector, to underscore the benefits that the LPFM service has brought to our community, and to respond to some of the questions asked in the Second Notice regarding how best to foster the stability and further growth of this valuable service as we look to the future.

THE WRFU EXPERIENCE - INVESTMENT AND REWARDS

As has been noted in other submissions, WRFU-LP is housed in the historic downtown post office building in Urbana, a building purchased and renovated at significant expense, thanks to the generosity of a large number of local community members. Equipment costs (studio and transmission) were similarly met entirely through local donations, as are annual operating expenses. We are currently more than mid-way through a fund-drive to raise an additional \$20,000 to erect a permanent antenna (which would allow us to reach our maximum licensed height of 100ft) and to replace and expand our studio equipment (facilitating an increased range of service to our community, including expanding our news-gathering facilities). Having been on air since 2005, and with substantial community investment in our purchase of property, fundraising for ongoing expenses, and station operations, we are proud of our contribution to our local economy and community, and welcome this opportunity to safeguard the future of this public resource.

About 80 individual community members devote considerable ongoing effort to bringing WRFU, a volunteer-operated, radio station to the air. We produce 75 hours of locally-originated live programming each week (of which more below) as well as bringing 45 hours of syndicated public affairs content, in several languages, to our listenership.

WRFU reflects the diversity of our community, on-air and off-, and our programming serves myriad constituencies, drawing together a disparate, and often fractured, community. We produce what we believe to be the only radio show produced by and for Native Americans in the Urbana area (Wednesday, 6-7pm, 11th Indian). Other shows speak to/from the Chicano community (Monday, 7-9pm, Radio Triple 'R'), the local Muslim community (Wednesday, 7-8pm, Muslim Mosaic; Saturday, 11am-12pm, Daughters of Eve), and various local Christian churches. One of our members, an investment professional, devotes considerable time and effort to produce 'Progressive Personal Finance' (Friday 8-9am) which "provides information that will help you meet your financial

needs with investment [and] also address your social and environmental concerns." 'Lolaka ya Africa' is a show focused on music, news, and culture from Africa. 'A Critical Ear', a show I produce and co-present myself, provides in depth critical analysis of US foreign policy, the local labor movement, and our media environment. Presented live weekly (Thursday, 6-7pm) from our WRFU studios, it is then edited for distribution through Pacifica's Audioport service, being picked up by stations such as WETX-LP in Johnson City, TN.

We're particularly proud of the diverse mix of faith-based programming. Where many translator-based operations push a single, remotely-originated, religious viewpoint into a community, WRFU-LP features a range of religious programming from diverse perspectives, with Muslim groups sharing airtime with evangelical Christians. We have even, in the past, featured an Interfaith series, where a collective of religiously-inspired activists from a wide range of perspectives - Unitarian, Jewish, Muslim, Christian - worked together to produce an informative and thoughtful show.

Urbana is also a University town (home to the University of Illinois' flagship campus) and our station is unusually successful in drawing together members of the undergraduate and graduate student populations, together with members of the broader community. Towns such as Urbana - and Urbana itself is no exception - can suffer from a disconnect between 'town' and 'gown', between those who see the town as their permanent home and those for whom it is a more temporary home, by virtue of its housing an educational institution. This fracturing of community is a negative development. WRFU-LP, through drawing from a mixture of the student and non-campus populations, is helping to overcome this divide, as volunteers work side by side to maintain and develop the station, and share airtime with each other. Indeed some individual programs are hosted by a combination of student and non-student members.

We have purposely kept our Saturday evening (8pm-12am) free of scheduled programming, in order to facilitate simulcasts from our on-site 2,500 sq. ft. multi-use performance space. This possibility has proven to be very popular with those arranging performances, increasing the desirability and, ultimately, the value of the venue. Additionally, various of our operators utilize internet streaming to allow them to produce live programming from the campus of the University of Illinois, from house parties, and elsewhere.

In addition to our locally-originated scheduled programming, WRFU-LP uses a computer-based automation system for those hours when volunteers are not present. We feature several different types of content in this system, and believe it

may be instructive for the Commission to consider the value that such 'automated' content can provide.

- First, we draw on live webstreams to provide content from Radio Bilingue (weekdays, 2-4pm) and World Radio Network (M-S, 4-7am) to our listeners. This content provides content and perspectives not otherwise available in our community, and our Radio Bilingue programming is, we understand, the only daily Spanish-language news programming available in the region. As such, while automated, and not originated locally, it does provide some valuable service to underserved community members.

- Second, during afternoon hours (4-8pm) when no local content is airing, we broadcast a selection of public affairs content designed to complement and extend the range of perspectives available in our community.

- Third, from 7-8am Monday through Friday, we broadcast extensive (10-15 minute) news bulletins in Spanish, French, and German, drawing on Radio France Internationale, Deutsche Welle, and Democracy Now! en español. These news bulletins provide alternative perspectives to those present in other news sources, as well as serving those for whom English might not be a first language, or students looking for 'real' and relevant opportunities to experience and be exposed to these other languages. We continue to explore additional outlets on which we can draw in this regard.

- Finally, and most relevant to considerations of localism, during other periods when our automation system is operating, it draws exclusively on a library of material from local artists, selected and prepared by our volunteer members. Extensive effort goes into sourcing this material and vetting it for on-air use (editing it where necessary), before adding it to our library. This process, and our conscious decision to showcase local artists in this manner, has resulted in significant exposure for local artists of various types (as an essentially free-form station, the music ranges from experimental sound art, to blues, to hip-hop). While recognizing and supporting the goals of the Commission in seeking to exclude 'repetitive' automated content from consideration as part of the local origination requirement [3rd RO @ 24], I suggest that in judging the contribution of LPFM stations to their local communities [as might result from 2NPRM @ 75] such sustained commitment to locally-originated cultural products should receive some attention. It would be inappropriate to give the same weighting to such automated playback as to a live performance by a local artist, but I would submit that this mix of content by local artists contributes value to the community (and enhances localism) in a manner that automated playing of a general music library would not.

Off-air, the station facilities, and the remainder of our premises, have proven a popular and productive educational site for field-tours from classes at the University of Illinois, allowing a 'hands on' educational experience while

also bringing media policy issues - including the long development of the LPFM rules - to life for students.

SPECIFIC QUESTIONS IN THE 2NPRM

I support the Commission's request to Congress [@ 72 and again @ 85] that it lift the 3rd channel adjacent restriction on LPFM. The Commission needs no further comment from me on the engineering or public policy arguments in favor of this move. I have been glad to see progress on this through S 1675 (Local Community Radio Act).

I have noted above the issues raised by our 'local music' auto-play library in relation to the 3rd RO @ 24, and additionally in relation to the questions raised in 2NPRM @ 75. I would repeat my suggestion that, particularly in relation to any assessment of the value provided to local communities by LPFM stations [75] that consideration be given to assigning a weighting to such content.

I would further note that, in relation to the implementation of [24] it is important that the Commission consider an appropriately comprehensive period. Community stations such as WRFU are, of necessity, volunteer-operated, and as such subject to the vagaries of illness, competing responsibilities, and the like. That a station might not meet the mandated minimum on a single particular day should not be sufficient to consider it to have breached the local origination requirement. I would suggest that a two-week window would be appropriate here.

I would further ask that the Commission consider the difference between, on the one hand, public affairs, talk-based programming, and on the other content consisting of recorded music (not originating in the community), selected by an operator, with short explanatory talk segments between tracks. I would humbly suggest that the Commission might consider that such talk-based programming, requiring a significant investment in planning other resources, provides a benefit to the community over and above content that solely consists of choosing and announcing music tracks, and that additionally it represents a significantly greater investment by the producers and the station, while contributing significantly to the 'local character' of the broadcast. I would further submit that such content should be granted an additional weighting by the Commission in any consideration of the local origination contribution of a station.

I would accept the Commission's argument regarding repeated plays of locally-originated shows [again @ 24].

In [76-77] the Commission proposes that proposed FPFM stations (or existing FPFM proposing modifications) that encroach on an existing LPFM station should be required to

meet certain costs relating to the the relocation of the LPFM station. This is a welcome development, in that it moves towards possible solutions for those stations impacted - or to be impacted in the future - by FPFM proposals. However, I would note the limitations of the relief proposed, and that such relief may not be sufficient to protect the investment made by license holders in their existing LPFM operations. In particular, I would note that the Commission proposes to limit the expenses to be met by the FPFM applicant to "physical changes" in the transmission system. For a low-budget operation, such as ourselves, the capital cost of changing transmission facilities/location would be only one of a series of unsustainable burdens. Specifically, we currently operate an on-site tower (on the roof of our down-town building) and are currently raising funds to build a permanent tower in our building grounds. Were we to be required to move our transmission location elsewhere, the cost of micro-wave links or scaling the new tower would be only our most immediate worry. The cost of rental of tower space would be prohibitive (at prevailing local rates) and such a scenario would also, of course, negate our substantial capital investment in building our own on-site tower facilities.

In relation to [84], where the Commission addresses the co-equal status of translators and LPFM stations, I would suggest that the Commission should have regard to the uncontested role of translators - to provide 'in-fill' of coverage areas for existing FPFM stations already serving a distinct community, of which the target population would, but for the accident of topography and FM propagation patterns, be part - as opposed to some of the more troubling and controversial practices that now abound, and also to the recognized innate role of FM radio as a locally-based service, reflected in the FCC's commitment to localism. I would also note, in light of the preceding description of the community investment - in all the senses of that word - in our station, that we would believe ourselves to have the greater claim in any altercation with a translator fed by a station that did not previously serve the general geographic area. I would endorse, therefore, calls to distinguish between terrestrial- and satellite-fed translators, and also to limit the number of 'hops' from originating station to end translator. The approach advocated by Prometheus allows bona fide concerns of local and regional broadcasters regarding 'in-fill' of coverage area to be met, without facilitating those engaged in the surreptitious building of national networks of zombie stations, which provide no local control or value, are (due to the ability to change originating station without prior notice) not subject to equitable regulation, and which in the hypothetical case in question can undercut local investment and activity.